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[Additional Counsel Appear On Signature Page]

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WASHINGTON

ROBERT and DANELLE BLANGERES,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

UNITED STATES SEAMLESS, INC.,
and KAYCAN LIMITED,

Defendants.

NO. 2:13-cv-00260-LRS

**MOTION FOR ADMISSION
*PRO HAC VICE***

Charles J. LaDuca (the “Applicant”) hereby moves the Court to enter an order permitting him to participate in this case *Pro Hac Vice* as counsel for Plaintiffs Robert and Danelle Blangeres (“Plaintiffs”), pursuant to Local Rule 83.2(c). In support of this Motion, the Applicant states as follows:

1 1. The Applicant is a partner in the law firm of Cuneo Gilbert &
2 LaDuca, LLP, in Bethesda, Maryland.

3 2. The Applicant is a member in good standing of the bars of several
4
5 United States federal courts, the highest state court of New York, and the District
6 of Columbia.

7 3. The Applicant does not reside in the State of Washington and does
8
9 not maintain an office in the State of Washington.

10 4. The Applicant responds to the information requested in Local Rule
11 83.2(c)(2) as follows:

12 (a) The Applicant's address and telephone number are 8120
13
14 Woodmont Avenue, Suite 810, Bethesda, Maryland, 20814; telephone
15 (202) 789-3960; facsimile (202) 789-1813; email: charles@cuneolaw.com.
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17 (b) The dates of admission to practice before other courts are
18 listed below:

<u>State Bar Admissions</u>	<u>Date Admitted</u>
New York	June 26, 2001
District of Columbia	July 8, 2002
<u>Federal Bar Admissions</u>	<u>Date Admitted</u>
United States Supreme Court	August 17, 2009

D.C. Circuit Court of Appeals	May 31, 2013
Second Circuit Court of Appeals	December 30, 2009
Third Circuit Court of Appeals	April 19, 2004
District of Columbia	October 4, 2004
Northern District of New York	November 20, 2002
Southern District of New York	April 24, 2013

(c) The name, address and telephone number of admitted counsel with whom the Applicant will be associated are: Beth E. Terrell and Erika L. Nusser of Terrell Marshall Daudt & Willie PLLC, 936 North 34th Street, Suite 400, Seattle, Washington, 98103-8869; telephone (206) 816-6603; facsimile (206) 350-3528; email: bterrell@tmdwlaw.com, enusser@tmdwlaw.com.

(d) The Applicant's appearance is necessary because Plaintiffs in this action have retained him in this action.

(e) There are no disciplinary sanction actions pending against the Applicant and the Applicant has never been subject to any disciplinary sanctions by any court or Bar Association.

5. The Applicant understands that if he is admitted *Pro Hac Vice* he will be subject to the disciplinary jurisdiction of this Court.

1 6. The Applicant is familiar with the facts, issues and documents
2 associated with this case.

3 7. The Applicant is familiar with the local rules of this Court.

4 WHEREFORE, Charles J. LaDuca respectfully requests that the Court
5 enter an order in the form proposed granting the admission *Pro Hac Vice* of
6 Charles J. LaDuca during the pendency of this case.
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8 I declare under penalty of perjury under the laws of the United States of
9 America that the foregoing is true and correct.
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12 Dated: 8/23/2013



13 Charles J. LaDuca, Applicant
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STATEMENT OF LOCAL COUNSEL

I, Beth E. Terrell, states that Erika L. Nusser and I are co-counsel for Plaintiffs in this matter. We will participate in a meaningful manner in preparation and trial of this case and we are authorized and will be prepared to handle this matter, including trial, in the event that the applicant Charles J. LaDuca is unable to be present upon any date assigned by the Court.

RESPECTFULLY SUBMITTED AND DATED this 28th day of August, 2013.

TERRELL MARSHALL DAUDT
& WILLIE PLLC

By: /s/ Beth E. Terrell, WSBA #26759
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CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify that on August 28, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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1 DATED this 28th day of August, 2013.

2
3 TERRELL MARSHALL DAUDT
4 & WILLIE PLLC

5 By: /s/ Beth E. Terrell, WSBA #26759

6 Beth E. Terrell, WSBA #26759

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14 *Attorneys for Plaintiff*